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13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA**  
15 **WESTERN DIVISION**

16 ROBERT HUNTER BIDEN, an  
17 individual,

18 Plaintiff,

19 vs.

20 PATRICK M. BYRNE, an individual,  
21 Defendant.

Case No. 2:23-cv-09430-SVW-PD

**PLAINTIFF ROBERT HUNTER  
BIDEN'S SUPPLEMENT TO  
MOTION FOR ENTRY OF  
DEFAULT JUDGMENT**

Judge: Hon. Stephen V. Wilson

Date: January 12, 2026

Time: 1:30 P.M.

Place: Courtroom 10A

1 Plaintiff Robert Hunter Biden (“Plaintiff”) hereby submits this supplement to  
2 his Motion for Entry of Default Judgment (“Default Judgment Motion”), filed on  
3 November 18, 2025 (ECF No. 350), to inform the Court of recent public statements  
4 of Defendant Patrick M. Byrne (“Defendant”) repeating the same Defamatory  
5 Statements on a widely distributed public forum that are the basis of this lawsuit. The  
6 continued public dissemination of these Defamatory Statements after the Court stated  
7 in its order denying Defendant’s summary judgment that Defendant did not have a  
8 basis for making the Defamatory Statements shows that Defendant will continue to  
9 defame Plaintiff unless he is punished by the imposition of significant punitive  
10 damages as requested in Plaintiff’s Default Judgment Motion.

11 On December 9, 2025, Defendant made a social media post on X (formally  
12 known as Twitter) saying: “Going live on Harrison smith@infowars.com to talk about  
13 many things including Hunter Biden.”<sup>1</sup> (See Ex. A.) Defendant then appeared on  
14 both the *Alex Jones Show* and Harrison Smith’s *War Room LIVE* on December 9,  
15 2025, in which he stated the same Defamatory Statements at issue in this matter, and  
16 on December 10, 2025, Defendant reposted a one-minute clip of the interview with  
17 Alex Jones on X containing such defamatory statements.<sup>2</sup> (See Ex. B.) That same  
18 post also stated “[f]ull segment @RealAlexJones” thereby directing Defendant’s  
19 followers and anyone who views the post to where they could find the full interview  
20 segment. (*Id.*) As of the date of this filing, that post has been viewed more than  
21 24,000 times. (*Id.*) Then, also on December 9, 2025, an X account attributed to Alex  
22 Jones posted the full 14-minute clip of Defendant’s interview with the caption:  
23 “Breaking Exclusive! Hunter Biden Solicited An 800 Million Dollar Bribe From Iran  
24 In Exchange For His Father Joe Biden To Unfreeze 8 Billion Dollars In Frozen Iranian  
25 Assets, CIA Whistleblower Patrick Byrne Tells Alex Jones In This Bombshell Report.  
26 To Bolster His Claim, Byrne Has Released One Of Many Exclusive Audio Tapes In

27 \_\_\_\_\_  
28 <sup>1</sup> <https://x.com/patrickbyrne/status/1998514367181238510?s=46>

<sup>2</sup> <https://x.com/patrickbyrne/status/1998830299262710105?s=46>

1 His Possession.”<sup>3</sup> (Ex. C.) As of the date of this filing, that post has been viewed  
2 over 121,000 times. (*Id.*) In the full clip posted by Alex Jones on December 9, 2025,  
3 not only does Defendant reiterate the same Defamatory Statements at issue in this  
4 matter, but he doubles-down on them by taunting Plaintiff about this lawsuit and  
5 publicly states he harbors malice toward Plaintiff. Defendant even claims Plaintiff is  
6 scared to face him in Court about these allegations despite Plaintiff being ready to  
7 proceed to trial last July with Plaintiff present every day in the courtroom while  
8 Defendant’s misconduct in delaying the trial, failure to appear for trial, and then  
9 intentionally ignoring this Court’s orders led to default being entered against him as  
10 a sanction.

11 Furthermore, one of the voicemails Defendant produced in this action is played  
12 in full. (*Id.*) That voicemail was designated as “HIGHLY CONFIDENTIAL”  
13 pursuant to the Stipulated Protective Order in this case (ECF No. 60). Defendant has  
14 intentionally violated the Stipulated Protective Order. Defendant has again shown he  
15 has no intention of obeying the orders of this Court.

16 This republication of the defamatory statements along with a HIGHLY  
17 CONFIDENTIAL recording years after the defamatory statements were first  
18 published and during the pendency of this matter demonstrates Defendant is a  
19 recidivist who will continue to maliciously attack Plaintiff with false statements.  
20 Nothing short of a harsh punitive damages award will be effective in curbing  
21 Defendant’s ongoing defamatory conduct against Plaintiff and outright disregard for  
22 this Court’s orders.<sup>4</sup>

23 \_\_\_\_\_  
24 <sup>3</sup> <https://x.com/realalexjones/status/1998532699636539411?s=46>

25 <sup>4</sup> Considering that Defendant has continued to defame Plaintiff with the same false  
26 statements at issue in this case, this case is comparable to E. Jean Carroll’s case  
27 against President Donald Trump. In the first case, Ms. Carroll was awarded \$5 million  
28 for defamation resulting from President Trump stating she lied about being sexually  
assaulted by him. Following that judgment, President Trump made the same  
defamatory statement for which he was previously found liable, and, at a second trial,

1 Dated: December 12, 2025

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2  
3 By: /s/ Zachary C. Hansen

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17 *Robert Hunter Biden*

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27 Ms. Carroll was awarded additional damages, including \$65 million in punitive  
28 damages alone, a 13x increase in damages from the first trial.